

KARDARAS & KELLEHER LLP  
 44 Wall Street  
 New York, NY 10005  
 (212) 785-5050  
 Attorneys for Defendant  
 SHENZHEN HIGH POWER  
 TECHNOLOGY CO. LTD.

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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ENERGIZER S.A.,	:	
	:	
Plaintiff,	:	07 CV 7406 (LTS)
	:	
Against	:	ECF CASE
	:	
M/V YM GREEN her engines, boilers and	:	<b>ANSWER TO COUNTERCLAIM</b>
Tackle <i>in rem</i> ; YANG MING MARINE	:	<b>OF DEFENDANTS YANG MING</b>
TRANSPORT CORP.; YANGMING (UK) LTD.;	:	<b>MARINE TRANSPORT CORP.</b>
ALL OCEANS TRANSPORTATION INC.;	:	<b>AND YANGMING (UK) LTD.</b>
KAWASAKI KISEN KAISHA LTD.; CONTERM	:	
HONG KONG LTD.; VANGUARD LOGISTICS	:	
SERVICES HONG KONG LTD.;	:	
FIEGE GOTH CO., LTD.; and SHENZHEN	:	
HIGH POWER TECHNOLOGY CO. LTD.	:	
	:	
Defendants.	:	

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Defendant SHENZHEN HIGH POWER TECHNOLOGY CO. LTD. ("High Power"), by its attorneys Kardaras & Kelleher LLP, as and for its answer to counterclaim of defendants Yang Ming Marine Transport Corp. ("Yang Ming Marine") and Yangming (UK) Ltd. ("Yangming UK") contained in their answer to the cross-claim of defendant High Power, alleges upon information and belief as follows:

1. Denies the allegations contained in paragraph 12 of the counterclaim of defendants Yang Ming Marine and Yangming (UK).

2. Denies knowledge and information sufficient to form a belief as to the allegations contained in paragraphs 13 and 14 of the counterclaim of defendants Yang Ming Marine and Yangming (UK)

3. Denies each and every allegation contained in paragraphs 15 and 16 of the counterclaim of defendants Yang Ming Marine and Yangming (UK) insofar as it refers to defendant High Power, and denies knowledge and information sufficient to form a belief as to any of the allegations as to the remaining defendants.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

4. Defendant High Power claims the benefit of all defenses raised by co-defendants and plaintiff in its response to cross-claims and counterclaims as well as its defenses set forth in its answer to plaintiff's complaint insofar as said defenses may be applicable to defendant High Power.

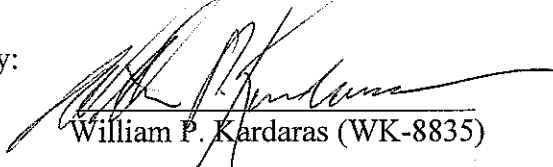
WHEREFORE, Defendant High Power prays that the counterclaim of defendants Yang Ming Marine and Yangming (UK) be dismissed with prejudice, together with costs, disbursements and attorney's fees and for such other and additional relief as to the Court may seem just and proper.

Dated: New York, NY  
February 28, 2008

Respectfully submitted,

KARDARAS & KELLEHER, LLP  
44 Wall Street  
New York, NY 10005  
Attorneys for Defendant  
SHENZHEN HIGH POWER  
TECHNOLOGY CO. LTD.

By:

  
William P. Kardaras (WK-8835)

To: HILL RIVKINS & HAYDEN LLP  
Attorneys for Plaintiff  
45 Broadway, Suite 1500  
New York, NY 10006

CICHANOWICZ CALLAN KEANE  
VENGROW & TEXTOR LLP  
Attorneys for Defendants  
YANG MING MARINE TRANSPORT CORP.,  
YANGMING (UK) LTD. and  
ALL OCEANS TRANSPORTATION, INC.  
61 Broadway, Suite 3000  
New York, NY 10006

MAHONEY & KEANE  
Attorneys for Defendant  
KAWASAKI KISEN KAISHA LTD.  
111 Broadway, 10<sup>th</sup> floor  
New York, NY 10006

DOUGHERTY RYAN GIUFFRA  
ZAMBITO & HESSION  
Attorneys for Defendant  
CONTERM HONG KONG LTD. and  
VANGUARD LOGISTICS SERVICES HONG KONG LTD.  
313 E. 38<sup>th</sup> Street  
New York, NY 10016

LENNON MURPHY & LENNON  
Attorneys for Defendant  
FIEGE GOTH CO. LTD.  
The Greybar Building  
420 Lexington Ave., Suite 300  
New York, NY 10170

**CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF**

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On February 28, 2008, I served a complete copy of SHENZHEN HIGH POWER TECHNOLOGY CO. LTD.'s Answer to Counterclaim of Defendants Yang Ming Marine Transport Corp. and Yangming (UK) Ltd., by regular U.S. mail and/or by ECF, to the following attorneys at their respective ECF registered address and/or at the following address:

HILL RIVKINS & HAYDEN LLP  
Attorneys for Plaintiff  
45 Broadway, Suite 1500  
New York, NY 10006

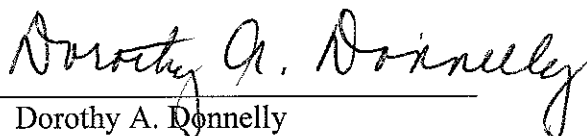
CICHANOWICZ CALLAN KEANE  
VENGROW & TEXTOR LLP  
Attorneys for Defendants  
YANG MING MARINE TRANSPORT CORP.,  
YANGMING (UK) LTD. and  
ALL OCEANS TRANSPORTATION, INC.  
61 Broadway, Suite 3000  
New York, NY 10006

MAHONEY & KEANE  
Attorneys for Defendant  
KAWASAKI KISEN KAISHA LTD.  
111 Broadway, 10<sup>th</sup> floor  
New York, NY 10006

DOUGHERTY RYAN GIUFFRA  
ZAMBITO & HESSION  
Attorneys for Defendant  
CONTERM HONG KONG LTD. and  
VANGUARD LOGISTICS SERVICES HONG KONG LTD.  
313 E. 38<sup>th</sup> Street  
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Dated: New York, New York  
February 28, 2008

LENNON MURPHY & LENNON  
Attorneys for Defendant  
FIEGE GOTH CO. LTD.  
The Greybar Building  
420 Lexington Ave., Suite 300  
New York, NY 10170

  
Dorothy A. Donnelly